

July 31, 2013

**Burnet R. Maybank, III**  
Member  
Admitted in SC

**VIA ELECTRONIC FILING**

Public Service Commission of South Carolina  
Docketing Department  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**Re: Docket No. 2013-207-C**

In the Matter of the Petition of Neustar, Inc., on Behalf of the South  
Carolina Telecommunications Industry, for Approval of NPA Relief  
Plan for the 843 NPA

Dear Ladies and Gentlemen:

Charleston

Charlotte

**Columbia**

Greensboro

Greenville

Hilton Head

Myrtle Beach

Raleigh

Attached for filing please find Windstream South Carolina, LLC's Petition to Intervene in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this Petition to Intervene as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



Burnet R. Maybank, III

BRM/sjn

Enclosures

cc: Nanette S. Edwards, Esq. via email

## STATE OF SOUTH CAROLINA

## (Caption of Case)

In the Matter of the Petition of Neustar, Inc., on  
 Behalf of the South Carolina Telecommunications  
 Industry, for Approval of NPA Relief Plan for the 843  
 NPA

BEFORE THE  
 PUBLIC SERVICE COMMISSION  
 OF SOUTH CAROLINA

## COVER SHEET

DOCKET

NUMBER: 2013 - 207 - C

(Please type or print)

Submitted by: Burnet R. Maybank, Esq.

SC Bar Number: 3699

Address: Nexsen Pruet, LLC

Telephone: 803-771-8900

1230 Main Street, Suite 700

Fax: 803-727-1472

Columbia, SC 29201

Other:

Email: bmaybank@nexsenpruet.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☒ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

## INDUSTRY (Check one)

- ☐ Electric  
☐ Electric/Gas  
☐ Electric/Telecommunications  
☐ Electric/Water  
☐ Electric/Water/Telecom.  
☐ Electric/Water/Sewer  
☐ Gas  
☐ Railroad  
☐ Sewer  
☒ Telecommunications  
☐ Transportation  
☐ Water  
☐ Water/Sewer  
☐ Administrative Matter  
☐ Other: \_\_\_\_\_

## NATURE OF ACTION (Check all that apply)

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Affidavit                 | <input type="checkbox"/> Letter                            | <input type="checkbox"/> Request                   |
| <input type="checkbox"/> Agreement                 | <input type="checkbox"/> Memorandum                        | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer                    | <input type="checkbox"/> Motion                            | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review          | <input type="checkbox"/> Objection                         | <input type="checkbox"/> Resale Agreement          |
| <input type="checkbox"/> Application               | <input type="checkbox"/> Petition                          | <input type="checkbox"/> Resale Amendment          |
| <input type="checkbox"/> Brief                     | <input type="checkbox"/> Petition for Reconsideration      | <input type="checkbox"/> Reservation Letter        |
| <input type="checkbox"/> Certificate               | <input type="checkbox"/> Petition for Rulemaking           | <input type="checkbox"/> Response                  |
| <input type="checkbox"/> Comments                  | <input type="checkbox"/> Petition for Rule to Show Cause   | <input type="checkbox"/> Response to Discovery     |
| <input type="checkbox"/> Complaint                 | <input checked="" type="checkbox"/> Petition to Intervene  | <input type="checkbox"/> Return to Petition        |
| <input type="checkbox"/> Consent Order             | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation               |
| <input type="checkbox"/> Discovery                 | <input type="checkbox"/> Prefiled Testimony                | <input type="checkbox"/> Subpoena                  |
| <input type="checkbox"/> Exhibit                   | <input type="checkbox"/> Promotion                         | <input type="checkbox"/> Tariff                    |
| <input type="checkbox"/> Expedited Consideration   | <input type="checkbox"/> Proposed Order                    | <input type="checkbox"/> Other: _____              |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest                           |  |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit             |  |
| <input type="checkbox"/> Late-Filed Exhibit        | <input type="checkbox"/> Report                            |  |

Print Form

Reset Form

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2013-207-C**

IN RE:

In the Matter of the Petition of	)	
Neustar, Inc., on Behalf of the South	)	
Carolina Telecommunications Industry,	)	<b>PETITION TO INTERVENE</b>
For Approval of NPA Relief Plan for	)	
The 843 NPA	)	

Petitioner Windstream South Carolina, LLC (“Windstream” or “Petitioner”), by its undersigned attorneys, hereby petitions the South Carolina Public Service Commission (the “Commission”), pursuant to Rule 103-825 of the Commission’s Rules, for an order allowing Windstream to intervene in the above referenced Docket, with full rights to participate as a party of record. In support of its Petition, Windstream would show the Commission the following:

1. Windstream is a facilities-based incumbent local exchange carrier in South Carolina.
2. Windstream seeks to intervene in this proceeding with full rights to participate as a party of record to represent its interests..
3. Windstream and its affiliates have an interest in this proceeding as members of the telecommunications industry referenced in the North American Numbering Plan Administrator’s petition filed on May 31, 2013 (“Petition”). Windstream, its affiliates, and their respective customers will be impacted by the outcome of the numbering plan and implementation schedule that is under consideration in this proceeding.

4. On June 12, 2013, AT&T South Carolina filed a Petition to Intervene in this docket. On June 25, 2013, the South Carolina Coalition filed a Petition to Intervene in this docket.

5. Windstream is generally supportive of the relief or the overlay solution described in the Petition and reserves the right to set forth its position more fully as necessary and appropriate as this proceeding moves forward.

6. Granting Windstream's request will not cause any undue delay to this proceeding and will aid the Commission in a full and fair consideration and resolution of the issues raised in this proceeding.

7. Correspondence and communications to Windstream with respect to this proceeding should be directed to undersigned counsel.

WHEREFORE, Windstream respectfully requests that the Commission grant this Petition and permit its intervention to protect its interests, and grant all other relief that is just and proper.

Respectfully submitted,  
**NEXSEN PRUET, LLC**  
BY: s/Burnet R. Maybank, III  
Burnet R. Maybank, III, Esquire  
1230 Main Street, Suite 700  
Columbia, SC 29201  
(803) 771-8900  
bmaybank@nexsenpruet.com  
Attorneys for Windstream South Carolina, LLC

July 31, 2013  
Columbia, South Carolina

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2013-207-C**

IN RE:

In the Matter of the Petition of	)	
Neustar, Inc., on Behalf of the South	)	
Carolina Telecommunications Industry,	)	CERTIFICATE OF SERVICE
For Approval of NPA Relief Plan for	)	
The 843 NPA	)	

This is to certify that I have caused to be served this day, the Petition to Intervene filed by Windstream South Carolina, LLC, as follows:

**ELECTRONIC MAIL SERVICE**

F. David Butler, Esq.  
Senior Counsel  
South Carolina Public Service Commission  
PO Box 11649  
Columbia, South Carolina 29211  
[david.butler@psc.sc.gov](mailto:david.butler@psc.sc.gov)

**ELECTRONIC MAIL SERVICE**

Nanette S. Edwards, Esq.  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC, 29201  
[nsedwar@regstaff.sc.gov](mailto:nsedwar@regstaff.sc.gov)

**ELECTRONIC MAIL SERVICE**

C. Lessie Hammonds, Esq.  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC, 29201  
[hammon@regstaff.sc.gov](mailto:hammon@regstaff.sc.gov)

**ELECTRONIC MAIL SERVICE**

Ms. Kimberly Miller  
Regulatory Policy Attorney  
Neustar-NANPA  
1775 Pennsylvania Avenue, W.  
4<sup>th</sup> Floor  
Washington, DC 20006  
[Kimberly.miller@Neustar.biz](mailto:Kimberly.miller@Neustar.biz)

**ELECTRONIC MAIL SERVICE**

Patrick W. Turner, Esq.  
BellSouth Telecommunications, LLC d/b/a AT&T South Carolina  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201  
[pt1285@att.com](mailto:pt1285@att.com)

**ELECTRONIC MAIL SERVICE**

Margaret M. Fox, Esq.  
McNair Law Firm, P.A.  
P.O. Box 11390  
Columbia, South Carolina 29202  
[pfox@mcnair.net](mailto:pfox@mcnair.net)

**ELECTRONIC MAIL SERVICE**

Scott Elliott, Esq.  
Elliott & Elliott, P.A.  
1508 Lady Street  
Columbia, SC 29201  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

July 31, 2013  
Columbia, South Carolina

s/ Shirley J. Neal  
Shirley J. Neal, Paralegal